

Patrick J. Reilly, Esq.
Nevada Bar No. 6103
Nicole E. Lovelock, Esq.
Nevada Bar No. 111887
Krystal J. Gallagher, Esq.
Nevada Bar No. 11573
HOLLAND & HART LLP
9555 Hillwood Drive, Second Floor
Las Vegas, Nevada 89134
Telephone (702) 669-4600
Facsimile (702) 669-4650
preilly@hollandhart.com
neloveock@hollandhart.com
kjgallagher@hollandhart.com

*Attorneys for Defendants William J. Hogan,
Thompson MacDonald, Ronald Schinnour,
Michael Hogan, Candeco Lava Products, Inc., and
Futureworth Capital Corp.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RONALD D. SLOAN; ROBIN SCHWARZ;
GARY COLLINS; JILL BROWN; LARK
TERRELL; NANCY HERBOLD; DANIEL
R. SLOAN; BETTY ANN SLOAN; PEARL
KIRK; JAMES BOAN; N O WAIT; LARRY
ORWICK; PATRICIA LA SALLE; BRIAN
WOLFE; STUART R. CAMERON;
ROBERT WEBSTER; HUGO BONDI;
JOAN BRATSETH; P A BRATSETH;
DEREK MILANI; DEAN RACHEY; SAM
BROUNSTEIN; SANDRA JANSEN; BRIAN
JANSEN; RHONDA KIM NICHOLS;
SCOTT NICHOLS; CARMEN ADAIR;
KRISTA SCHOFIELD; MARK BRATSETH;
ROSE TRUST 11; CLIFF OLSON; DON
COLLINS; ROYCE NORDSTROM;
NATALIE MAYZEL; DAVID JESSKE;
THORNTON D. BARNES; JAMES HASON;
SANDRA HASON; EDDIE GUILLET;
RYAN GUILLET;

ON BEHALF OF CAN-CAL RESOURCES,
LTD.,

Plaintiffs,

vs.

CAN-CAL RESOURCES, LTD., a Nevada
corporation; WILLIAM J. HOGAN;
THOMPSON MACDONALD; RONALD

Case No.:

NOTICE OF REMOVAL

Holland & Hart LLP
9555 Hillwood Drive, Second Floor
Las Vegas, Nevada 89134

SCHINNOUR; MICHAEL HOGAN;
CANDEO LAVA PRODUCTS, INC. a
Canadian Corporation, and FUTUREWORTH
CAPITAL CORP., a Canadian Corporation,

Defendants.

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that Defendants William J. Hogan, Thompson MacDonald, Ronald Schinnour, Michael Hogan, Candeo Lava Products, Inc., and Futureworth Capital Corp. (hereinafter collectively referred to as “Removing Defendants”) hereby remove to this Court, pursuant to 28 U.S.C. § 1441, the state court action described below.

1. On or about May 29, 2014, an action was commenced in the District Court in and for Clark County, Nevada, entitled *Ronald D. Sloan, Robin Schwarz, Gary Collins, Jill Brown, Lark Terrell, Nancy Herbold, Daniel R. Sloan, Betty Ann Sloan, Pearl Kirk, James Boan, N O Wait, Larry Orwick, Patricia La Salle, Brian Wolfe, Stuart R. Cameron, Robert Webster, Hugo Bondi, Joan Bratseth, P A Bratseth, Derek Milani, Dean Rache, Sam Brounstein, Sandra Jansen, Brian Jansen, Rhonda Kim Nichols, Scott Nichols, Carmen Adiar, Krista Schofield, Mark Bratseth, Rose Trust 11, Cliff Olson, Don Collins, Royce Nordstrom, Natalie Mayzel, David Jesske, Thornton D. Barnes, James Hason, Sandra Hason, Eddie Guillet, Ryan Guillett, on behalf of Can-Cal Resources, LTD, Plaintiffs, vs. Can-Cal Resources, LTD., a Nevada Corporation, William J. Hogan, Thompson MacDonald, Ronald Schinnour, Michael Hogan, Candeo Lava Products, Inc., a Canadian Corporation, and Futureworth Capital Corp., a Canadian Corporation, Defendants*, as Case No. A-14-701465-B. A copy of the Complaint is attached hereto as **Exhibit “A”**.

2. This Court has original jurisdiction over this action under 28 U.S.C. § 1331 because Plaintiff’s Complaint alleges violations of the Sarbanes-Oxley Act of 2002 and Securities Exchange Act of 1934. Exhibit A at ¶¶ 23, 63-65, 100(D), 113, 123(b), 128, 130. While a specific federal claim is not pleaded, the plaintiffs’ “right to relief necessarily depends on resolution of a substantial question of federal law” and is thus removable. *Franchise Tax Board v. Construction Laborers Vacation Trust*, 463 U.S. 1, 27-28 (1983).

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July, 2014, a true and correct copy of the foregoing **NOTICE OF REMOVAL** was served by depositing same in the United States mail, first class postage fully prepaid to the persons and addresses listed below:

Suvinder S. Ahluwalia, Esq.
410 South Rampart Blvd., Suite 350
Las Vegas, Nevada 89145
Attorneys for Plaintiffs

/s/ Susann Thompson
An employee of Holland & Hart LLP

Holland & Hart LLP
9555 Hillwood Drive, Second Floor
Las Vegas, Nevada 89134